

FILED

MAY 7 2003

DONALD F. PHELAN  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ473-03-20

Superior Court

Docket Number 03-05-00076-S

STATE OF NEW JERSEY

v.

ROBERT M. FRONJIAN

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Theft by Failure to Make Required Disposition  
of Property Received- Third Degree)

ROBERT M. FRONJIAN

between on or about July of 1997 and on or about January 8, 2000,  
at the City of Hoboken, in the County of Hudson, elsewhere and  
within the jurisdiction of this Court, purposely did obtain or  
retain property valued in excess of \$500, upon agreement or  
subject to a known legal obligation to make specified payment or  
other disposition, and did deal with the property as his own and  
did fail to make the required payment or disposition, that is,  
the said ROBERT M. FRONJIAN, sole owner of RMF, Inc., did  
purposely obtain or retain money valued in excess of \$500 from  
the Traders of the Day Investment Club and individually William  
T. Pletcher, Leanne M. Pletcher, Floyd A. Searer and Sue B.

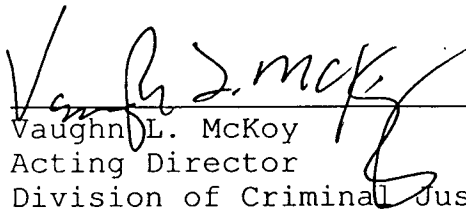
Searer, upon agreement or subject a known legal obligation that the said ROBERT M. FRONJIAN would use the funds for trading and investment activities and did deal with funds in excess of \$500 as his own and did fail to use the said funds for trading and investment activities, contrary to the provisions of N.J.S.A. 2C:20-9, and against the peace of this State, government, and dignity of the same.

COUNT TWO

(Securities Fraud- Third Degree)

ROBERT M. FRONJIAN

between or about July 1997 and on or about January 8, 2000, at the City of Hoboken, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did in connection with the offer, sale, or purchase of any security, directly or indirectly did employ a device, scheme or artifice to defraud, in that the said ROBERT M. FRONJIAN knowingly did, in connection with the offer, sale, or purchase of securities, that is, a promise to invest in an Electronics Trading Group trading account in the amount of \$50,000, mislead investors, that is, the Traders of the Day Investment Club and individually William T. Pletcher, Leanne M. Pletcher, Floyd A. Searer and Sue B. Searer, by falsely stating that all of the money received from the investors would be used for trading and investment activities, contrary to the provisions N.J.S.A. 49:3-52(a) and N.J.S.A. 49:3-70, and against the peace of this State, the government and dignity of the same.

  
Vaughn L. McKoy  
Acting Director  
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 5-7-03